

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,	§
	§
v.	§ Criminal Number: H-4:21-cr-00103
	§
MOHAMED MOKBEL,	§
	§
_____ Defendant.	§

NOTICE OF FIRST STIPULATION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES THE UNITED STATES OF AMERICA by and through its United States Attorney, and Defendant MOHAMED MOKBEL, by and through his counsel, and respectfully places this Honorable Court on notice of the following Stipulation between the United States and Defendant Mohamed Mokbel, as described herein:

STIPULATION NUMBER 1

The defendant Mohamed Mokbel and the United States hereby stipulate that:

1. A representative from J.P. Morgan Chase Bank (“hereinafter referred to as “Chase”) would testify that the documents at pages 3 and 26 of Exhibit 530 are fictitious checks not issued by Chase in that there is no such account number 652408684 in the name of William Kistler or account number 028463518 in the

name of Maya Bast. As a result, \$1,028.00 from the former Chase account and \$500 from the latter fictitious Chase account were never deposited into a Bank of America account for Distinguished Pharmacy with an account number ending in 2711.

2. A representative from Bank of America would testify that the document at page 10 of Exhibit 530 is a fictitious check not issued by Bank of America in that there is no such account number 635008651 in the name of Charles Chapman. As a result, \$260.81 from that fictitious Bank of America account was never deposited into a Bank of America account for Distinguished Pharmacy with an account number ending in 2711.

3. A representative from Well Fargo Bank would testify that the documents at pages 12, 17, 19, 21 and 23 of Exhibit 530 are fictitious checks not issued by Wells Fargo Bank in that there is no account number 5420635184 in the name of Kelvin Dopwell, no account number 1652699857 in the name of Verna Burgoon, and no account number 5840206357 in the name of Donna Nyman. As a result, \$600.00 from the fictitious account in the name of Kelvin Dopwell, \$322.76 from the fictitious account in the name of Verna Burgoon, and \$1,031.12 from the fictitious account in the name of Donna Nyman was never deposited into a Bank of America account for Distinguished Pharmacy with an account number ending in

2711.

4. United States Postal Inspector Andrew Shadowens would testify that United States Postal Money Orders are documents issued by the United States Post Office and are promissory notes typically designed to send money through the mail. They are purchased for a fee, do not include personal identifying information of the purchaser, have a watermark and multicolored thread to prevent fraud, and are considered property of the United States Postal Service. Once purchased, the money is then disbursed by the United States Post Office and can be redeemed at an FDIC insured bank.

Pages 2, 5, 6, 9, 14, 15, 33 of Exhibit 530 are fictitious United States Postal Money Orders. This was determined, in part, due to the fact that, for a real Postal Money Order, all but the last number of the serial number are to be added and then divided by nine. The result of that equation will be the last number of the serial number. In this case, all of the aforementioned pages did not meet that requirement. In other words, they are fictitious because when all but the last number of the serial number are added and divided by nine, the result is not the last number of the serial number. As a result, \$10.00 from the fictitious money order with serial number 22650001231, \$10.00 from the fictitious money order with serial number 2365002106, \$10.00 from the fictitious money order with serial number

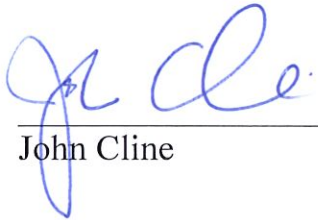
22650007928, \$10.00 from the fictitious money order with serial number 23650032106, \$10.00 from the fictitious money order with serial number 23650035123, \$10.00 from the fictitious money order with serial number 23650001124, and \$10.00 from the fictitious money order with serial number 22980004126 could not have been deposited into a bank account in the name of Distinguished Pharmacy.

A black ink signature of Charles Flood, consisting of a large, stylized 'C' followed by a series of loops and a horizontal stroke.

Charles Flood

A black ink signature of Adam Laurence Goldman, featuring a series of loops and a horizontal stroke.

Adam Laurence Goldman
Assistant United States Attorney

A blue ink signature of John Cline, with a stylized 'J' and 'C' followed by a horizontal stroke.

John Cline

A blue ink signature of Kathryn Leigh Olson, with a stylized 'K' and 'O' followed by a horizontal stroke.

Kathryn Leigh Olson
Assistant United States Attorney

A black ink signature of Mohamed Mokbel, with a stylized 'M' and 'M' followed by a horizontal stroke.

Mohamed Mokbel